

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

NOV 18 2015

UNITED STATES OF AMERICA

§ BY DEPUTY _____

V.

§ CRIMINAL NO. 6:15CR 71
§ JUDGE MHS/JDL

JAMIE MEADOR (01)

aka “Hollywood”

AMBER JONES (02)

AMANDA COUSINS (03)

aka "Amanda Lindsay"

CARL BRENT MORSE (04)

TARA CARPENTER (05)

SEALED

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

COUNT ONE

Violation: 21 U.S.C. § 846

(Conspiracy to possess with intent to distribute methamphetamine, a Schedule II controlled substance)

Beginning on a date unknown to the United States Grand Jury, and continuing thereafter until at least July 21, 2015, in the Eastern District of Texas and elsewhere, **Jamie Meador, aka “Hollywood”, Amber Jones, Amanda Cousins, aka “Amanda Lindsay”, Carl Brent Morse, and Tara Carpenter**, the defendants herein, did knowingly, intentionally and unlawfully, combine, conspire, confederate, and agree with each other and with others, both known and unknown to the United States Grand Jury, to violate the laws of the United States of America, to wit, 21 U.S.C. § 841(a)(1), prohibiting the possession with intent to

distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine or 50 grams or more of methamphetamine (actual), a Schedule II controlled substance.

All in violation of 21 U.S.C. § 846.

COUNT TWO

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about October 1, 2014, in the Eastern District of Texas, **Jamie Meador, aka "Hollywood", Amber Jones, Amanda Cousins, aka "Amanda Lindsay", Carl Brent Morse, and Tara Carpenter**, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT THREE

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about December 1, 2014, in the Eastern District of Texas, **Jamie Meador, aka "Hollywood", Amber Jones, and Amanda Cousins, aka "Amanda Lindsay"**, defendants herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT FOUR

Violation: 21 U.S.C. § 841(a)(1) (Possession
with intent to distribute methamphetamine)

On or about February 26, 2015, in the Eastern District of Texas, **Jamie Meador, aka
“Hollywood”, Amber Jones, and Amanda Cousins, aka “Amanda Lindsay”**, defendants
herein, did knowingly and intentionally possess with intent to distribute
methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §
841(a)(1).

COUNT FIVE

Violation: 21 U.S.C. § 841(a)(1) (Possession
with intent to distribute methamphetamine)

On or about March 31, 2015, in the Eastern District of Texas, **Jamie Meador, aka
“Hollywood”, Amber Jones, and Amanda Cousins, aka “Amanda Lindsay”**, defendants
herein, did knowingly and intentionally possess with intent to distribute
methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §
841(a)(1).

COUNT SIX

Violation: 18 U.S.C. § 924(c)
(Use, carrying, and possession of a firearm
during and in furtherance of a drug trafficking
crime)

On or about March 31, 2015, in the Eastern District of Texas, **Jamie Meador, aka “Hollywood”, Amber Jones, and Amanda Cousins, aka “Amanda Lindsay”**, defendants herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, that is possession with intent to distribute methamphetamine, a Schedule II controlled substance, as charged in Count One of this indictment, and in furtherance of said crime possessed a firearm, in violation of 18 U.S.C. § 924(c).

COUNT SEVEN

Violation: 21 U.S.C. § 841(a)(1) (Possession with intent to distribute methamphetamine)

On or about July 21, 2015, in the Eastern District of Texas, **Amanda Cousins, aka “Amanda Lindsay”**, defendant herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE
Pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853, & 28 U.S.C. §2461

As the result of committing one or more of the foregoing offenses alleged in this indictment, the defendants herein shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853 and 28 U.S.C. § 2461:

1. any property constituting, or derived from, and proceeds the defendants obtained, directly or indirectly, as the result of such violations;
2. any of the defendants' property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations, and/or;

CASH PROCEEDS

\$100,000.00 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is proceeds obtained directly or indirectly as a result of the commission of the aforesaid violations.

Substitute Assets

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property, including but not limited to all property, both real and personal owned by the defendants.

By virtue of the commission of the offenses alleged in this indictment, any and all interest the defendants have in the above-described property is vested in the United States

and hereby forfeited to the United States pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853 and 28 U.S.C. § 2461.

A TRUE BILL

Bk

GRAND JURY FOREPERSON

JOHN M. BALES
UNITED STATES ATTORNEY

Bill Baldwin

BILL BALDWIN
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11-18-2015

Date

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§ JUDGE_____

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§ SEALED

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NOTICE OF PENALTY
COUNT 1

Violation:

21 U.S.C. § 846 (Conspiracy to possess with intent to distribute and distribution of 500 grams or more of methamphetamine, a Schedule II controlled substance)

Penalty:

Imprisonment for a term of not less than 10 years or more than life, a fine not to exceed \$10,000,000, or both. A term of supervised release of at least 5 years in addition to such term of imprisonment.

Special Assessment:

\$100.00

COUNTS 2, 3, 4, 5, 7

Violation:

21 U.S.C. § 841(a)(1) (Possession with intent to distribute and distribution of methamphetamine, a Schedule II controlled substance)

Penalty:

Imprisonment for a term of not more than 20 years, a fine not to exceed \$1,000,000, or both. A term of supervised release of at least 3 years in addition to such term of imprisonment.

Special Assessment:

\$100.00

COUNT 6

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

Penalty: Imprisonment for a term of not less than 5 years or more than life, which must be served consecutively to any other term of imprisonment, a fine not to exceed \$250,000, or both. A term of supervised release of not more than 5 years in addition to such term of imprisonment.

In the case of a second or subsequent conviction of this offense, the term of imprisonment shall not be less than 25 years.

Special Assessment: \$100.00